UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Case No. 3:12-cv-50298
WILLIAM P. BUTCHER, AS SPECIAL REPRESENTATIVE FOR THE ESTATE)))
OF ALBERT CAMPER AND MATTIE CAMPER, CITY OF ROCKFORD,) Judge: Frederick J. Kapala
ILLINOIS, GORDON BEEKS, UNKNOWN HEIRS AND LEGATEES OF ALBERT CAMPER,)
UNKNOWN HEIRS and LEGATEES OF MATTIE CAMPER, UNKNOWN))
OWNERS and NON-RECORD CLAIMANTS,) Designated Magistrate: P. Michael) Mahoney
Defendants.)

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE AND SALE

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1", Affidavit).

Respectfully submitted,

ZACHARY T. FARDON

United States Attorney

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CERTIFICATE OF SERVICE

I, Caleb J. Halberg, certify that a true and correct copy of the foregoing **Motion for Entry of Judgment of Foreclosure** was served upon counsel of record, if any, through operation of the Court's Case Management/Electronic Case Files system on April 1, 2014, and on the following non-ECF filers by first class mailing:

William Butcher, Special Representative for the Estate of Albert Camper and Mattie Camper 2044 Ridge Road Homewood, IL 60430

City of Rockford Nora Doyle, Legal Administration Asst. 425 East State Street Rockford, IL 61104

Gordon Beeks 15419 Dobson Avenue Dolton, IL 60419

Unknown Heirs and Legatees of Albert Camper 424 Knowlton St. Rockford, IL 61102

Unknown Heirs and Legatees of Mattie Camper 424 Knowlton St. Rockford, IL 61102

Unknown Owners and Non-Record Claimants 424 Knowlton St. Rockford, IL 61102

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